

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT, MICHIGAN

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Case numbers : 20-mj-30135  
: 20-mc-50585  
: 19-CV-12313

**DEFENDANT(S)' SUPPLEMENTAL RESPONSE TO THE PLAINTIFF PLEADINGS  
RECEIVED SEPTEMBER 23<sup>RD</sup> 2021 IN THE MATTER UNDER CASE NUMBER  
20-MC-50585**

**SUPPLEMENTAL PLEADINGS DATED SEPTEMBER 24<sup>th</sup> , 2021  
OPPOSITION & CONTEST AGAINST ANY FORFEITURE IN THESE MATTERS AND RELATED TO THESE MATTERS**

**A. INTRODUCTION**

I, Jyde Adelakun, hereby depose and state as follows that:

1. I am a male, Chief Executive Officer of Touch of Fame Group registered in November 2010 in the state of Georgia in the United States of America, as well as the Chief Executive Officer of TOF Energy Corporation that was registered in the state of Georgia in 2013 and I am currently a resident of South Africa with African ethnic decent. I already attached the certified copies of the certificates of incorporation of the said two (2) separate corporations as exhibit **"JA 0"**.
2. By virtue of my position, I am duly authorized to make and depose to this brief amongst others, on behalf of Touch of Fame Group and myself, and the facts contained herein are within my personal knowledge or belief, unless the contrary appears from the context, and are to the best of my knowledge and belief, to be true and correct.

I hereby also additionally RELY ON and adopt the same as readily pleaded and argued in my previous briefs in support of motions filed already on August 24<sup>th</sup>, 2021 August 30<sup>th</sup> 2021, September 1<sup>st</sup> 2021, and September 10<sup>th</sup>, 2021 amongst others, through to this day September 21<sup>st</sup>, 2021 and September 23<sup>rd</sup> 2021 in these matters.

3. This day September 23<sup>rd</sup> 2021, I received the Plaintiff's responsive Argument / pleadings in the matter under case number 20-mc-50585, requesting for the dismissal of the Defendant's Motions in these matters and related matters in this Honorable Court. I adopt and maintain all the points and issues already raised so far by me and I further add below as it follows. IT IS PERTINENT TO STATE THAT THE PLAINTIFF, DESPITE CLEAN CLEAR UNDISPUTED EXHIBITS SUBMITTED BY THE DEFENDANT(S) CONTRARY TO THE FALSE ALLEGATIONS OF THE PLAINTIFF, FURTHER SHOWED OR DEMONSTRATED THE INSUFFICIENT CONCERN TO QUANTIFY HER RECKLESSNESS AS DEFINED IN CASE LAWS, STATING CARELESSLY AND REPEATEDLY

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FALSE ALLEGATIONS, CONTRARY TO THE CLEAR PAYMENT TERMS WRITTEN IN THE SAID BCMA, BUT REPEATEDLY ACCUSED THE DEFENDANT(S) WITHOUT A SHRED OF LEGALLY VALID EVIDENCE THAT THE DEFENDANT(S), CHIKA OBIANWU AND OYENIRAN OYEWALE FRAUDULENTLY PROCESSED 329 E-CHECKS AT THE GEORGIA TERMINAL AMONGST OTHERS.

4. The Plaintiff began the argument and pleadings on the criminal complaint that was filed on March 17, 2020, and acknowledged the clear facts that at-least, there were already seizure warrants issued or obtained in these matters of which arose the motions of the defendants in these matters after taking cognizance of the matter as received for the first time on August 8<sup>th</sup> 2021 from the Judicial side of United Arab Emirates as readily stated;
5. In addition to the preceding paragraph, beside the facts stated therein, there's also already warrants issued on March 5, 2019 in the related matter under case number 19-CV-12313, that of which the defendants' names (Touch of Fame Group, Jyde Adelakun, Chika Obianwu) were falsely cited countlessly in multiple times as the officers of Touch of Fame Group that registered as Merchant with Worldpay and that were *falsely ACCUSED to have fraudulently processed 329 e-Checks via the terminal located at the Savannah address in the sovereign jurisdiction of Georgia*, as falsely gathered from the Fifth Third bank head office address in Cincinnati, Ohio by the corporate investigator Chris Allen "CA", *See all paragraphs in the sworn affidavits of complaint used to obtain the seizure warrants on March 5<sup>th</sup>, 2019 in the matter under case number 19-CV-12313 COMPARED TO all other related sworn affidavit of complaint* INITIALLY USED IN THE YEARS 2019 AND 2020 *TO DECEIVE THIS COURT AND FRAUDULENTLY OBTAIN THE SEIZURE WARRANTS IN THESE CASES UNDER 19-CV-12313, 20-MC-50585 and 20-MJ-30135 used in obtaining the arrest warrants, COMPARED NOW TO THE AMENDED AFFIDAVIT OF COMPLAINT DATED SEPTEMBER 17<sup>TH</sup> 2021;*
6. Further to the abovesaid, the '*defendants in rem*' are funds partly belonging to Touch of Fame Group as paid out legally on a business related basis and to effect business related purposes, salaries and allowances amongst others and these said '*defendants in rem*' are now being placed in the amended complaint for forfeiture dated September 17<sup>th</sup> 2021 as subjects for forfeiture under the related matter case number 19-CV-12313;

**JURISDICTION - THIS COURT IS COMPETENT TO DECIDE**

7. The plaintiff under argument 1 page 5 argued that this court lacks the jurisdiction to decide on the defendant's motion raised over the orders (warrants) that were granted in violation of the Constitution, due process amongst others entrenched in the Constitution, that by nature are automatically nullities and or NULL and VOID and deserves no respect or recognition as settled law, even before reversal;

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8. Whereas, it is settled law that null and or void order(s) can be attacked both directly and collaterally in any proceeding, at any time and as many times as possible. And further whereas, there're palpable defects in these matters, as Constitutional substantial matters, as obviously clear, plain and recognized by the plaintiff's swift dash to the amendments to the affidavits of complaint dated September 17<sup>th</sup> 2021, after the motions of the defendants were filed and the reliefs sought, brought to the surface the palpable defects against which reliefs are sought. The defendants further addressed the palpable defects amongst others that surely **cannot sustain the warrants initially obtained or granted** in these matters, so that this Court has the Jurisdiction to decide on the motions of the defendants for remedies that surely will result in a different disposition of these matters, declaring the initial warrants obtained in violation of due process and the Constitution, as nullities and or the resulted warrants therefrom also as null and void, as settled law;
  
9. On page 11 para 19 of the affiant affidavit exhibit "JA 1". The affiant affirmed that I was arrested together with Patrick Mwenze in the UAE, same was confirmed in the exhibit "JA 4". Also in the amended complaint dated September 17<sup>th</sup>, 2021, same were affirmed therein. And in the plaintiff's argument dated September 23<sup>rd</sup> 2021 as filed, the plaintiff confirmed her activities with the UAE Authorities in dispatch requests amongst others. And yet, despite plaintiff's clear affirmed knowledge of the foregoing, PLAINTIFF ATTEMPTED AS A PRACTICE, TO DECEIVE THIS COURT REPEATEDLY OVER AND OVER IN THE ARGUMENT, BY CONSTANTLY STATING **CONTRARY** TO THE FACTS KNOWN TO THE PLAINTIFF THAT DEFENDANT WAS ARRESTED IN THE UAE FOR THE SAME FACTS BEING FALSELY ACCUSED OF BY THE PLAINTIFF, AND IT WAS FOR THAT REASON THAT THE MATTER WAS ORDERED TO BE UNSEALED AS AFFIRMED IN THE EXHIBIT "JA 4", REGARDLESS, THE PLAINTIFF ATTEMPTED TO TRY HER LUCK IN AN ATTEMPT TO DECEIVE THIS COURT BY DELIBERATELY STATING CONTRARY TO THE CLEARLY KNOWN FACTS TO SEE IF THIS COURT SHALL FALL FOR IT.

IT IS SETTLED LAW THAT, AN ATTEMPT BY THE OFFICER OF THE COURT TO deceive the court is fraud and denies the Court the subject matter jurisdiction and a violation of the due process of the law. I hereby humbly and respectfully urge this Court to so hold that, in several attempts by the officer of Court (plaintiff) to deceive this Court, this Court lacks the subject matter jurisdiction to further entertain or honor any claim of the plaintiff against the defendant(s) in these matters. I humbly hereby urge this Court to dismiss the claims of the plaintiff against the defendant(s);

10. Additionally, On page 2 of the Plaintiff's Argument filed on September 23<sup>rd</sup> 2021, the plaintiff **argued that this court chiefly lack the jurisdiction in these matters. SAVE THAT THIS COURT HAS THE JURISDICTION TO ADJUDICATE OVER THE MOTIONS OF THE DEFENDANTS AND THE RELIEF SOUGHT AGAINST THE UNCONSTITUTIONAL ACTIONS THE PLAINTIFF IN THESE MATTERS**, THE DEFENDANT COULD NOT AGREE ANY LESS, AS THE DEFENDANTS ALREADY PLEADED THAT THIS COURT LACK THE JURISDICTION FROM THE INCEPTION ON VARIOUS GROUNDS AND FURTHER **ALSO ON THE BASIS OF THE SETTLED LAW THAT, THIS COURT IS DENIED THE SUBJECT**

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**MATTER JURISDICTION BY THE ATTEMPT OF THE OFFICER OF THE COURT AND THE AFFIANT(S) IN THESE MATTERS:**

- a. TO DECEIVING AND SUCCESSFULLY DECEIVED THIS COURT TO OBTAINING AND FRAUDULENTLY OBTAINED THE SEIZURE WARRANTS AND ARREST WARRANTS, AT MULTIPLE TIMES, ON DIFFERENT MULTIPLE OCCASSIONS WITHIN ALMOST 3 CONSECUTIVES YEARS, WITH MULTIPLE SWORN AFFIDAVITS OF COMPLAINT KNOWINGLY CONTAINED:**
- i. RECKLESS FRAUDULENT ERRORS OR DELIBERATE FALSE STATEMENTS OR DECEITFUL SUBMISSIONS OR RECKLESS OR FRAUDULENT MISREPRESENTATIONS OF FACTS AND DURING MULTIPLE JUDICIAL PROCEEDINGS,**
- b. defrauding the judicial machinery of this court and or to have successfully defrauded and or subverted the integrity of the judicial process in this Court to issuing continuous warrants out of considerable proportion under oath to an abuse of Constitutional powers, **contrary to or against its purpose as supposed a fair arbiter of justice;****
- c. to deceiving/deceive and deceived THIS COURT successfully that there is/was PROBABLE CAUSE TO BELIEVE and or caused this Court to premise on the fraudulent misrepresentation of facts or reckless multiple errors over THE YEARS – not until the defendants noticed the fraud and filed motions against the said fraud amongst others – THAT :**
- i. fraud had occurred at the Savannah address location of Touch of Fame Group in the sovereign jurisdiction of the State of Georgia;**
- ii. the said fraud was perpetrated by Touch of Fame Group at its terminal registered in the jurisdiction of the State of Georgia;**
- iii. the terminal in the jurisdiction of the State of Georgia was registered in the name of Touch of Fame Group;**
- iv. Touch of Fame Group registered as merchant with Worldpay in August 2018 and fraudulently processed 329 electronic checks via the terminal location at the Savannah location in Georgia;**
- v. That the registered officers of Touch of Fame Group, Jyde Adalakun, Chika Obianwu and Oyeniran Oyewale fraudulently processed 329 e-Checks at the Georgia terminal location in Savannah address;**
- vi. That Touch of Fame Group designated the Fifth Third bank account ending in 6656, allegedly maintained in the name of Touch of Fame Group, within the Jurisdiction of Georgia;**

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vii. *That Chika Obianwu opened the Fifth Third bank account in Michigan for the purpose of receiving fraudulently acquired payment deposits and all the other reckless misrepresentations that were already pleaded in all the briefs in support of the motions filed to this Court;*

11. *Whereas, after the defendants' filed motions to this court with reliefs sort, the plaintiff realized and swiftly went from the initial sworn affidavits of complaint made in violation of the due process, fundamental fairness, equal protection of the law amongst others and the Constitution of the United States of America in these matters, to the resulted amendments of affidavit of complaint with containing further allegations NOT previously cited in the genesis affidavits and warrants, SO THAT THE AMENDED sworn affidavits, CANNOT SUSTAIN THE WARRANTS ISSUED INITIALLY. And as a consequence of NULL and VOID orders in violation of the Constitution or due process, is settled as NULL and VOID;*
12. *In light of the above, I respectfully submit to this honorable Court to refuse the requests of the plaintiff and to so hold, that there are palpable defects in these matters, as the defendants' motions raised substantial Matters that would result in a different disposition of these matters, declaring the initial warrants obtained in violation of due process and the Constitution, as nullities and or the resulted warrants therefrom also as null and void, as settled principle of law;*

**IMPACTS OF UNJUSTIFIABLE/UNREASONABLE INACCURATE REPORTING**

13. *Whereas, **CLEAR GUIDANCE ARE OFFERED** TO ANY REASONABLE OFFICER THAT REPORTING RECKLESS OR DELIBERATELY FALSE INFORMATION, - AS IN THESE INSTANT MATTERS, - IS IMPROPER. See Anderson v. Creighton, 483 U.S. 635, 640 (1987);*

*Also, Franks and the existing precedent of the Third, Eight, and Ninth Circuits "place the Constitutional question beyond debate". Mullenix v. Luna, 136 S.Ct. 305, 308 (2015) (quoting Ashcroft v. al-Kidd, 563 U.S. 731, 741 (2011). The precedent demonstrates that "a law enforcement officer who recklessly or deliberately reports false information subsequently relied upon in a warrant application VIOLATES clearly established Fourth Amendment rights under Franks, REGARDLESS OF WHETHER THE OFFICER ACTUALLY PREPARES, PRESENTS, OR SIGNS A WARRANT APPLICATION, OR PROVIDES THE INFORMATION FOR THE PURPOSE OF ITS USE IN THAT APPLICATION.*

*The law was also clear in the Fifth Circuit. HART established the principle that an officer who deliberately **or recklessly provides** false information "for use in an affidavit" VIOLATES THE FOURTH AMENDMENT and cited to the Third and Ninth Circuits as support. 127 F.3d at 448-49;*

***It is settled law that Franks liability extends to the officer of the Court,*** (See HART v. O'BRIEN, 127 F.3d 424 (5<sup>th</sup> Cir. 1997); Franks v. Delaware [1978].);

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*"The warrant requirement IS MEANT TO PROTECT THE INTEREST, NOT TO BE MERELY AN INCONVENIENCE TO BE SOMEHOW WEIGHED AGAINST THE CLAIMS OF LAW ENFORCEMENT EFFICIENCY." See Riley v. California, 134 S. Ct. 2473, 2493 (2014)*

*"False or misleading reports can also allow the government to obtain a warrant and invade an innocent civilian's home, despite the very core of the Fourth Amendment", See also Kyllo v. United States, 533 U.S. 27, 31 (2001) (quoting Silverman v. United States, 365 U.S. 505, 511 (1961);*

*"A warrant's legitimacy depends on the truthfulness of its content. Inaccurate law enforcement reports can lead to the issuance of warrants UNSUPPORTED BY THE NORMAL STANDARD OF PROBABLE CAUSE, threatening every person's freedom to come and go...without law enforcement officer interference". See Navarette v. California, 134 S. Ct. 1683, 1697 (2014);*

*"Unlawful warrants based on inaccurate reporting NOT only contravene the Fourth Amendment, BUT ALSO THREATEN THE LEGITIMACY OF LAW ENFORCEMENT in the eyes of the public."; See Navarette v. California, 134 S. Ct. 1683, 1697 (2014);*

*In Herring v. United States, 555 U.S. 135 (2009), the CHIEF JUSTICE ROBERTS emphasized the exclusionary rule SHOULD CONTINUE to apply where a warrant includes an intentional falsehood or reckless mistake EVEN WHEN AN IGNORANT COLLEAGUE executes the warrant. Id. At 146 (citing Leon, 468 U.S. at 923 n.24);*

*In Arizona v. Evans, 514 U.S. 1 (1995), IT IS EMPHASIZED THAT EXCLUSIONARY RULE SHOULD BE USED TO DETER UNLAWFUL LAW ENFORCEMENT CONDUCT. Id. at 15*

14. Furthermore to the above, as soon as I learnt of the above 'defendants in rem' from the amended complaint for forfeiture in the case number 19-CV-12313, as subject for forfeiture, wherein all interested parties are asked to show cause as to the reasons why the 'defendants in rem' should NOT be forfeited to the United States, I quickly MADE KNOWN the CONCRETE interest of Touch of Fame Group and filed together in the responsive pleadings filed yesterday September 22<sup>nd</sup> 2021 in the cases under 20-mj-30135, 20-mc-50585 and 19-CV-12313, SO THAT NOW, this court is aware of the concrete interest of Touch of Fame Group also in the defendants in rem placed as subject for forfeiture;

15. As already pleaded, it is settled law that a void order or void judicial action **are nullities**, which include the warrants granted in these matters In violation of the due process, the Constitution, Rule 41 of the Fed. Rules of Criminal Procedure as already raised, amongst others as already raised in the motions and supporting briefs of the defendants, SO THAT THE SAID WARRANTS, INITIAL AFFIDAVITS AND ALL RESULTS THEREFROM ALL NULL AND VOID EVEN BEFORE REVERSAL AND FURTHER SO THAT THE REQUEST OF THE PLAINTIFF TO HOLD IN ABEYANCE THE MOTIONS OF THE DEFENDANT(S), PENDING THE EXECUTION OF THE NULL OR VOID WARRANTS (ORDERS) IN THE UNITED ARAB EMIRATES, THAT WHICH AS SETTLED LAW, DESERVES



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***NO RESPECT OR RECOGNITION IN NATURE EVEN BEFORE REVERSAL. I therefore humbly urge this court as arbiter of justice, to deny and refuse the request of the plaintiff;***

16. Further to the above, this Court has the jurisdiction to decide the motions of the defendant(s) and I urge this Court to so do over the motions of the defendant(s) and grant all the reliefs sought by the defendant(s). I respectfully submit;

**CONSTITUTIONAL QUESTIONS OF LAW**

17. Whether this honorable Court of Michigan has the Jurisdiction in this matter where ***NO LAWFULLY ESTABLISHED CRIME IS/WAS*** lawfully determined to have being COMMITTED in the sovereign jurisdiction of Michigan, AND OR where NO lawfully established proceed(s) of crime was/were received or found in the jurisdiction of Michigan, as a result of a lawfully established or determined crime to have being committed in the sovereign jurisdiction of Georgia by former employer, TOUCH OF FAME GROUP ?;
18. Whether there's compliance with the required Due process of the law, equal protection of the law, amongst others guaranteed rights in the Constitution of the United States and of the Sovereign States of Georgia (former employer jurisdiction) and Rhode Island (my Residence) as referenced in the 10<sup>th</sup> Amendments of the Constitution of the United States in conjunction with judicial power granted under Article III Section 2 of the Constitution of the United States ?;
19. Whether the intervention by the officers of the United States Secret Service assigned to the jurisdiction of the State of Michigan over funds received from the former employer Touch of Fame Group, **IS IN COMPLIANCE WITH THE CONSTITUTION OF THE UNITED STATES AND THE SOVEREIGN STATES OF GEORGIA AND RHODE ISLAND ?;**
20. WHETHER there was reasonable probable cause INITIALLY in 2018, 2019 and 2020 to believe that there is/was a crime lawfully established to have being committed and that the crime is/was lawfully established or lawfully determined to have being committed by the former employer Touch of Fame Group through which I received the funds concern in this matter ?;
21. Whether the initial complaint basis, Sworn affidavits, Warrants and or the initial legal basis for the warrants or **ground(s) for the seizure in the first instance in 2018, 2019 and 2020 prior to September 2021,** ARE IN COMPLIANCE WITH THE REQUIRED DUE PROCESS OF THE LAW, FUNDAMENTAL FAIRNESS, EQUAL PROTECTION OF THE LAW AS STIPULATED IN THE CONSTITUTION OF THE UNITED STATES ?;
22. Whether the INITIAL sworn affidavit of complaint related to the initial warrants, ground(s) or facts or evidence amongst others INITIALLY CITED OR RELATED therein or referred to as probable cause therein, in the initial sworn affidavit of complaint in the years 2018, 2019 and 2020, - **after investigation, to obtaining the warrants in**

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*those said years in this matter or related matters, **and obtained** the said warrants, - **ARE IN COMPLIANCE WITH THE DUE PROCESS OF THE LAW AMONGST OTHERS GUARANTEED IN THE CONSTITUTION AND CAN STILL SUSTAIN THE SAID SAME WARRANTS PRIOR TO SEPTEMBER 2021 AND OR ARE IN VIOLATION OF THE CONSTITUTION OF THE UNITED STATES OF AMERICA OR THE REQUIRED DUE PROCESS OF THE LAW, SO THAT THEY ARE NULLITIES OR NULL AND VOID INCLUDING THE PROCEEDINGS EVEN BEFORE REVERSAL AS SETTLED LAW?***

23. *Whether the referred to NULLITIES OR NULL AND VOID WARRANTS, PROCEEDINGS, INITIAL RELATED AFFIDAVITS OF COMPLAINT AMONGST OTHERS as stated or quantify in the preceding paragraph HEREIN UNDER “vi” above, **CAN BE AMENDED AS IN THE INSTANT MATTER AND RELATED MATTERS** to NOW sustain or obtain further warrants (orders) for seizure and or forfeiture amongst others as in these instant matter or related matters, DESPITE IT IS SETTLED LAW THAT “Any order or judgment based on a void order or judgment is void” ?;*
24. *Whether this honorable Court has/had exceeded or not its powers of authority, to have granted or issued ANY warrant(s) or further warrant(s) in this matter and or related matters, in violation of the required due process of the law, equal protection of the law, FUNDAMENTAL FAIRNES amongst others guaranteed in the Constitution and or the Constitution of the United States of America, where it is settled law that “Courts are constituted by authority and they cannot go beyond that power delegated to them. If they **act beyond that authority, and certainly in contravention of it,** their judgements and **orders are regarded as nullities; they are not voidable, but simply void, and this even prior to reversal**” ?*
25. I hereby leave the above questions of law to this honorable Court for correct answers and interpretation of the law as the arbiter of Justice, in the interest of Justice and or public policy and the oath or beholden in duties to the Constitution of the United States of America;

**CONCLUSION**

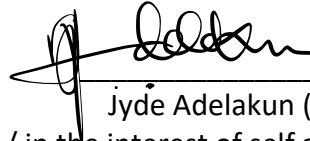
26. *On the grounds of Article III Section 2 of the Constitution of the United States in conjunction with the Tenth Amendment, this Court lacks the jurisdiction from the inception to have acted **where no crime was committed in the jurisdiction of Michigan** and where NO PROCEED(S) of any crime was found in the Jurisdiction of Michigan and where NO PROCEED(S) OF ANY CRIME was traceable to the jurisdiction of Michigan, where NO CRIME WAS ESTABLISHED TO HAVE OCCURRED BY THE COMPETENT AUTHORITIES ASSIGNED TO THE JURISDICTION OR OHIO, BUT SUCH FICTIONAL NON EXISTING CRIME WAS FORMULATED WITH FALSE ALLEGATIONS, MISREPRESENTATION OF FACTS IN OTHER TO ARBITRARILY CONFER THE JURISDICTION TO MICHIGAN, IN AN ATTEMPT TO COVER UP THE VIOLATIONS OF THE CONSTITUTION, DUE PROCESS OF THE LAW AMONGST OTHERS BY THE AFFIANT(S), AND THE OFFICER(S) OF THIS COURT, AND TO DENY THE DEFENDANT(S) THE DUE PROCESS OF THE LAW AMONGST OTHERS;*



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27. *I hereby urge this Court to grant all the reliefs of the defendants and further decline jurisdiction of the subject matter in this Cases, and declare all processes, proceedings, including all warrants amongst others as a result of like of jurisdiction from the inception, AS NULLITIES.*



Jyde Adelakun (Filer / Deponent)

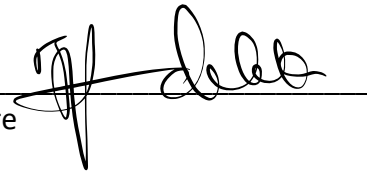
and on behalf / in the interest of self and Touch of Fame Group

I certify that I have notified the Plaintiff, at the office of the Attorney General, Mark Chasteen via the email: [mark.chasteen@usdoj.gov](mailto:mark.chasteen@usdoj.gov) and [Michael.el-zein@usdoj.gov](mailto:Michael.el-zein@usdoj.gov), on this day September 24, 2021 and prior to this day, with copies of the briefs and motion as well as the exhibits thereto, but was unable to discuss my request and argument.

WHEREFORE, I humbly and respectfully request that this court speedily grant this reliefs or motions and order the requested relief(s).

Dated: Sept 24, 2021

Signature



Telephone Number: +971 50 662 1652

Jyde Adelakun and on behalf of Touch of Fame Group

\_\_\_\_\_  
Name of Filer (*Pro Se Litigant*)

Address: 11300 Expo Blvd #1013, San Antonio, TEXAS 78230; Email: [adeljyde@gmail.com](mailto:adeljyde@gmail.com)